

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE )  
TATE, JEREMY S. MELTON, ISSACCA POWELL, )  
KEITH BURGESS, TRAVIS BOYD, TERRENCE )  
DRAIN, and KIMBERLY ALLEN on behalf of )  
Themselves and all similarly situated persons )

PLAINTIFFS, )

v. )

BILL OLDHAM, in his individual capacity as former )  
Sheriff of Shelby County, Tennessee; FLOYD )  
BONNER, JR., in his official capacity as Sheriff of )  
Shelby County, Tennessee; ROBERT MOORE, in his )  
individual capacity as former Jail Director of Shelby )  
County, Tennessee; KIRK FIELDS, in his official )  
capacity as Jail Director of Shelby County, Tennessee; )  
CHARLENE McGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of Shelby County, )  
Tennessee; REGINALD HUBBARD, in his official )  
capacity as Assistant Chief of Jail Security of Shelby )  
County, Tennessee; DEBRA HAMMONS, in her )  
individual capacity as former Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; TIFFANY )  
WARD in her official capacity as Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; SHELBY )  
COUNTY, TENNESSEE, a Tennessee municipality; )  
TYLER TECHNOLOGIES, INC., a foreign corporation; )  
GLOBAL TEL\*LINK CORPORATION, a foreign )  
corporation; SOFTWARE AG USA, INC., a foreign )  
corporation; and SIERRA-CEDAR, INC., a foreign )  
corporation, SIERRA SYSTEMS GROUP, INC., a )  
foreign corporation; and TETRUS CORP, a foreign )  
corporation )

DEFENDANTS. )

**Case No.: 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY,  
& INJUNCTIVE RELIEF**

**JURY TRIAL EMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

**MOTION AND MEMORANDUM OF GARRETT M. ESTEP TO WITHDRAW  
AS COUNSEL FOR TETRUS CORP.**

Garrett M. Estep respectfully moves for leave of Court to withdraw as counsel for Tetrus Corp (“Tetrus”). Mr. Estep is one of two Memphis lawyers that represent Tetrus. Robert A. McLean also represents Tetrus, and will continue to do so. This motion is filed with the knowledge and consent of Tetrus.

Grounds for this motion are that the undersigned is retiring from the active practice of law and winding up his case load. Withdrawal will not impact any of the ongoing proceedings in this case, and no party will be prejudiced. Mr. McLean represented Tetrus at the July 9, 2021 court hearing, and will continue to represent Tetrus through the remaining proceedings in this case.

It is requested that Mr. Estep’s formal leave to withdraw from representation of Tetrus in this case be granted.

CERTIFICATE OF COUNSEL

Prior to filing this motion, the undersigned consulted with the other attorneys in this case. There is no opposition to the motion.

Respectfully submitted,

/s/ Garrett M. Estep

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served on the following counsel of record via the Court's CM/ECF system, this 20th day of July, 2021:

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